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Response to Debtors' Objection & JUN -6 PM 3: 48 Motion to Accept Late Filing CLERK US BANKED TO DELAWARE

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: FTX Trading Ltd., et al.,

Debtors.

Case No. 22-11068 (JTD) Jointly Administered

MOTION TO ACCEPT LATE-FILED RESPONSE & RESPONSE TO DEBTORS' OBJECTION TO CLAIM NO. 95643

Submitted by:

Lee Tarone Embury on behalf of Envoy aka VOY (Lando Tech OU)

Dear Judge Dorsey and Counsel:

I, Lee Tarone Embury, respectfully file this Response and Motion for Leave to File Late, contesting the Debtors' Objection to Claim No. 95643, originally filed on behalf of Envoy aka VOY (Lando Tech OU). This claim reflects amounts owed under a formal agreement with Quoine Pte Ltd. (Liquid Global) for services rendered.

Unfortunately, due to a lack of timely notification and information being sent to our team, I was unaware of the original objection and deadline. I respectfully request that the Court accept this late-filed response based on excusable neglect under Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure.

(a) Caption

Court: U.S. Bankruptcy Court for the District of Delaware

Debtors: FTX Trading Ltd., et al. Lead Case Number: 22-11068 (JTD)

Objection Title: Debtors' Eleventh Omnibus Objection to Claims (No Liability Claims) -

Docket No. 27190

(b) Claimant Details

Name of Claimant: Envoy aka VOY (Lando Tech OU)

Claim Number: 95643

Date: May 22, 2025

SETTLEMENT AGREEMENT

THIS SETTLEMENT AGREEMENT is made this 30 day of october

2022 (the "Agreement")

BETWEEN:

- 1. **QUOINE PTE. LTD.** (UEN: 201414068E), a company incorporated in Singapore and having its registered office at 11 Irving Place, #09-01, Singapore 369551 ("**Quoine**"); and
- 2. LANDO TECH OU, (Reg No: 16060286) a company incorporated in Estonia ("Sponsor"),

(collectively the "Parties" and each a "Party").

WHEREAS :-

- (A) Quoine and the Sponsor had entered into a Liquid Listing Agreement dated 30 September 2020 (the "Listing Agreement") for the purpose of achieving various aims and objectives relating to the listing on Quoine's digital asset exchange platform, Liquid ("Liquid"), of Sponsor's Envoy (NVOY) digital asset (the "Asset" or "Assets"). In relation to the listing of the Assets on Liquid, Quoine and the Sponsor had also entered into a Token Services Agreement (Quick Exchange and Warm Wallet) dated 1 March 2021 (the "Token Services Agreement") for Quoine to enable and make available certain services for the Assets to users on Liquid.
- (B) In accordance with Article 9.2 of the Listing Agreement, Quoine had on 29 September 2022 served a notice to terminate the Listing Agreement on the Sponsor. In accordance with clause 3 of the Token Services Agreement, Quoine had on 29 September 2022 also served a notice to terminate all services provided under the Token Services Agreement.
- (C) The Parties are desirous of settling the various disputes arising out of termination of the Listing Agreement and/or the Token Services Agreement on the terms and subject to the conditions set out herein.

IT IS HEREBY AGREED as follows:

1. Compensation Payment

1.1 Quoine shall pay the following amount to the Sponsor within 7 days from the date of this Agreement:

USD 25,000 (the "Settlement Sum").

1.2 The Settlement Sum may be paid by Quoine in USD Coin (USDC) or Tether (USDT) as follows:

Currency	Reference Rate	Wallet Address
USDC	1:1 with USD	[Sponsor to insert wallet address]
USDT	1:1 with USD	0xf8c0f0c78550cf48c1d91db3516a1963a82ccee8

1.3 Notwithstanding anything in this Agreement, all amounts payable by Quoine to the Sponsor shall be subject to any deductions or withholdings which Quoine may be entitled or required to make under applicable laws. Sponsor shall be responsible for any tax that Sponsor or Quoine may be required to collect or pay now or at any time in the future with respect to the Settlement Sum.

2. Full and final settlement; No admission of liability

- 2.1 The payment of the Settlement Sum shall be in full and final settlement of any and all claims, damages, losses, expenses, costs, disbursements and other liabilities which may occur against or be suffered by the Sponsor relating to this Agreement and/or the Listing Agreement and the Token Services Agreement or its relationship with Quoine and its products and services and Quoine shall not be liable whatsoever to the Sponsor for any payments, claims or damages whatsoever arising thereunder.
- 2.2 This Agreement shall not constitute any admission of liability whatsoever by Quoine and is entered into without prejudice to the rights of Quoine.
- 2.3 Notwithstanding any provision to the contrary herein, the Parties shall be entitled to rely on the terms and conditions of this Agreement to prove the existence of a settlement (including its terms and conditions) by the Parties in respect of payment of the Settlement Sum.

Termination of the Listing Agreement and Token Services Agreement and the listing of the Assets

- 3.1 The Sponsor agrees and acknowledges that save for Article 4 (Handling of Confidential Information) of the Listing Agreement, which shall continue in full force and effect,] the Listing Agreement shall be deemed to be null and void and of no effect whatsoever with effect on and from 29 October 2022 and each of the Parties shall cease to have any of the rights conferred on it or him under the Listing Agreement and shall be released and discharged from all its obligations thereunder with effect therefrom (including any refund of any fees paid by the Sponsor thereunder (if applicable)).
- 3.2 The Sponsor agrees and acknowledges that the Assets shall be delisted from Liquid on 29 October 2022.
- 3.3 For the avoidance of doubt, notwithstanding anything else in this Agreement or in the Listing Agreement, Quoine reserves the right to delist the Assets from Liquid at any time without notice to the Sponsor if any of the follow events occur:
 - a. Quoine determines in its sole discretion that Liquid is to be decommissioned;
 - Sponsor is found by Quoine to be in breach of this Agreement or of the Liquid Terms of Use;
 - the Monetary Authority of Singapore, a competent court, or any other applicable governmental authority in Singapore declares that the Assets constitute a security or similarly regulated capital markets product ("Regulated Financial Product") under applicable laws or regulations;

- d. Quoine has reasonable grounds to believe that the Assets are likely to constitute (i) a Regulated Financial Product; or (ii) other high-risk products pursuant to assessments made under or pursuant to applicable laws and regulations;
- e. Quoine has reasonable grounds to believe that the continuation of the listing of the Assets constitutes, or would constitute, a violation of any existing or future law or regulation or regulatory framework which Quoine, Sponsor would be subject to; or
- f. events or circumstances arise at any time while the Assets are listed on Liquid for secondary trading which raise reputational issues for either party, create negative sentiment among trades of the Assets, or which Quoine determines, in its sole discretion, suggest that it is no longer in Quoine's commercial or reputational interests to continue to list the Assets on Liquid.
- The Sponsor agrees and acknowledges that Quoine makes no representation or warranty that it will nor does it undertake to, introduce the Sponsor to any of its related corporations (collectively, the "FTX Group") or cause the Assets to be listed on any FTX platform.
- 3.5 The Sponsor agrees and acknowledges that the Token Services Agreement shall be deemed to be null and void and of no effect whatsoever with effect on and from 3 October 2022 and each of the Parties shall cease to have any of the rights conferred on it or him under the Tokens Services Agreement and shall be released and discharged from all its obligations thereunder with effect therefrom. The Sponsor further agrees to the termination of Quick Exchange support for the Assets with effect from 29 September 2022.

4. Sponsor's Undertakings

- 4.1 In consideration of Quoine's payment of the Settlement Sum, the Sponsor agrees, undertakes and covenants the following:
 - 4.1.1 to hereby fully waive all rights, benefits, interests in any claims, demands, actions, judgments, proceedings and costs and expenses (including legal costs) it may have against Quoine and/or the FTX Group, clients of Quoine or the FTX Group (the "Clients"), past or current or future shareholders, agents, representatives, officers and employees of Quoine or the FTX Group (collectively, the "Representatives"), arising in tort, negligence, strict liability or otherwise, directly or indirectly, out of or relating to this Agreement and/or the Listing Agreement and the Token Services Agreement or its relationship with Quoine and its products and services;
 - 4.1.2 not make and shall not permit or cause to be made any further demand and/or file a suit or legal action or arbitration proceedings or any other proceedings whatsoever whether in Singapore or elsewhere against Quoine and/or (where applicable) the FTX Group, the Clients or Representatives in respect of the Listing Agreement and the Token Services Agreement or its relationship with Quoine and its products and services or any or all claims, damages, losses, expenses, costs, disbursements and other liabilities which may occur against or be suffered by the Sponsor in connection with the Listing Agreement and the Token Services Agreement or its relationship with Quoine and its products and services;
 - 4.1.3 keep strictly confidential and shall not, except as prior authorized by Quoine in writing, reveal to any person:-

- a. the terms and conditions of this Agreement and shall not divulge, disseminate, reveal or disclose to any person, entity, organisation or body whether in Singapore or elsewhere, any particulars, information or details in respect of, arising out of or in connection with this Agreement or the settlement herein or the Listing Agreement;
- b. any information (whether transmitted orally, in writing, electronically or in other form) of which it has including without limitation, trade secrets or confidential operations, processes or inventions carried on or used by Quoine or the FTX Group, information concerning the business, affairs, operations, assets and organisation, dealings, clients, customers, principals, suppliers, product research and development, pricing lists, consultants, officers and financial information of Quoine or the FTX Group, including without limitation, the technology, data, processes, designs, ideas, product research and development, market studies and surveys, concepts, plans, costings, designs, contracts and agreements with third parties, advertising and promotional materials, sales publications, documentation, manuals, budgets, financial statements, tax information, accounts, suppliers' lists, customer lists, drawings, notes, memoranda concerning or relating to any of the above and shall not use or attempt to use any such information in any manner which may be likely to injure or cause loss either directly or indirectly to Quoine or the FTX Group or their business. This restriction shall continue without limit in point of time but shall cease to apply to information or knowledge which may come into the public domain otherwise than as a result of a breach of this clause.
- 4.1.4 not to make or cause to be made public statements or communications that disparage, whether directly or indirectly:
 - a. Quoine and the FTX Group;
 - b. the business, services, products of Quoine and the FTX Group;
 - c. the Clients; and
 - d. the past, current or future shareholders, agents, representatives, officers and employees of Quoine and the FTX Group (in their capacity as such).
- 4.2 The obligations in clause 4.1.4 include oral or written statements made by or caused to be published in any forum or through any medium, including every electronic and/or social media but nothing in clause 4.1.4 shall prohibit the Sponsor from making such statements when required to do so by any applicable law.

5 Sponsor's representations and warranties

The Sponsor represents and warrants that as of the date of this Agreement and until the date the Settlement Sum is paid by Quoine neither it nor anyone acting on its behalf has filed/issued a suit or legal action or arbitration proceedings or any other proceedings whatsoever against Quoine or the FTX Group or the Clients or Representatives in any court and/or tribunal of competent jurisdiction in Singapore or in any other forum in respect of any claim in connection with the Listing Agreement and the Token Services Agreement or their

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termination thereof or its relationship with Quoine and its products and services, and will not issue any such legal proceedings in the future.

6. Costs

Each Party shall bear all costs and expenses (legal or otherwise) incurred by it in connection with and/or arising out of this Agreement.

7. Giving effect to the Agreement

Parties must do all such acts and things (including the execution of any document) that may be reasonably required to give full effect to this Agreement.

8. Variations

No variation of this Agreement shall be valid unless it is in writing and signed by or on behalf of each of the Parties to this Agreement.

9. Binding on successors

This Agreement shall be binding upon and inure to the benefit of the Parties, their legal representatives and successors (by purchase, assignment, foreclosure, or whatever means).

10. No assignment

No Party shall assign or transfer any of its rights under this Agreement without the prior written consent of all the Parties.

11. Severance

If any term or provision in this Agreement is held to be illegal or unenforceable, in whole or in part, under any enactment or rule of law, such term or provision or part shall to that extent be deemed not to form part of this Agreement but the enforceability of the remainder of this Agreement shall not be affected.

12. Waiver

No waiver of any breach, or failure to enforce any provision, of this Agreement at any time by either Party shall in any way limit or waive the right of such Party to subsequently enforce and compel strict compliance with the provisions of this Agreement.

13. Counterparts; Electronic signatures

This Agreement may be executed in two or more counterparts, each of which shall be deemed an original and all of which together shall constitute one instrument. Electronic signatures of the parties, whether digital or encrypted, will have the same force and effect as manual signatures. Delivery of a signed counterpart copy of this Agreement by facsimile transmission, by email and PDF attachment, or by any other electronic means will have the same effect as physical delivery of the paper document bearing an original or electronic signature.

14. Third party rights

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For the avoidance of doubt, save for any member of the FTX Group, a person or entity who is not a party to this Agreement shall have no right under the Contracts (Rights of Third Parties) Act 2001 to enforce or otherwise rely on any of the terms stated herein.

15. Entire agreement

This Agreement hereby cancels and supersedes all prior representations, arrangements, agreements and understandings between the Parties (if any) relating to the termination of the Listing Agreement and the Token Services Agreement and sets forth the entire agreement and understanding between the Parties relating to the termination of the Listing Agreement and the Token Services Agreement.

16. Governing law

This Agreement shall be governed by and construed in accordance with the laws of Singapore.

17. Jurisdiction

Any dispute, claim, difference or controversy arising out of, relating to, or having any connection with this Agreement (a "Dispute"), shall be referred to and finally resolved by arbitration. The arbitration shall be conducted in accordance with the Arbitration Rules of the Singapore International Arbitration Centre (the "Rules"). The tribunal shall consist of three arbitrators. The members of the tribunal shall be appointed in accordance with the Rules. The seat, or legal place of arbitration, shall be Singapore. Part II of the International Arbitration Act (Cap. 143A), as amended from time to time, shall apply to any arbitration proceedings commenced under this clause. The language used in the arbitral proceedings shall be English.

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The Parties have executed this Settlement Agreement as of the date first written above.

Quoine Pte. Ltd.

By:

Name: Seth Melamed

Title: COO & Director

Address for Notices: Marina Bay Financial Centre Tower 1, #11-18, 8 Marina Boulevard, Singapore

018981

Email: seth@liquid.com/ legal_global@liquid.com

Lando Tech OU

By:

Name: lee tarone

Title: ceo

Address for Notices:

Email: lee@envoydefi.com

Lee@VoyFINANCE.COM

Lee@Voy, FINANCE

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

FTX TRADING LTD., et al., 1

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: December 12, 2024 at 1:00 P.M. ET Objection Deadline: December 6, 2024 at 4:00 P.M. ET

DEBTORS' ONE HUNDRED TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION SHOULD CAREFULLY REVIEW THIS OBJECTION AND LOCATE THEIR NAMES AND CLAIMS ON <u>SCHEDULE 1</u> AND <u>SCHEDULE 2</u> OF <u>EXHIBIT A</u> ATTACHED TO THIS OBJECTION AND, IF APPLICABLE, FILE A RESPONSE BY THE RESPONSE DEADLINE FOLLOWING THE INSTRUCTIONS SET FORTH HEREIN.

FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "<u>Debtors</u>") hereby submit this one hundred twenty-seventh omnibus claims objection (this "<u>Objection</u>") for entry of an order, substantially in the form attached hereto as Exhibit A (the "<u>Order</u>"), pursuant to sections 105(a) and 502(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the "<u>Bankruptcy Code</u>"), rule 3007 of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), and rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

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Delaware (the "Local Rules"), disallowing and expunging in its entirety each claim set forth in Schedule 1 and Schedule 2 attached to the Order. In support of this Objection, the Debtors submit the Declaration of Rob Esposito in support of Debtors' One Hundred Twenty-Seventh (Substantive) Omnibus Objection to Certain No Liability Claims (Customer Claims) (the "Esposito Declaration"), attached hereto as Exhibit B. In further support of this Objection, the Debtors respectfully state as follows:

Background

- 1. On November 11 and November 14, 2022 (as applicable, the "Petition Date"), the Debtors filed with the Court voluntary petitions for relief under the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors' cases (the "Chapter 11 Cases") was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an Official Committee of Unsecured Creditors (the "Committee") pursuant to section 1102 of the Bankruptcy Code [D.I. 231].
- 2. Additional factual background relating to the Debtors' businesses and the commencement of these Chapter 11 Cases is set forth in the *Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 24], the *Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 57], the

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Supplemental Declaration of John J. Ray III in Support of First Day Pleadings [D.I. 92] and the Supplemental Declaration of Edgar W. Mosley II in Support of First Day Pleadings [D.I. 93].

Facts Specific to the Relief Requested

- 3. On June 28, 2023, the Court entered the *Order (I)(A) Establishing*Deadlines for Filing Customer Proofs of Claim, (B) Approving Procedures for Submitting Proofs of Claim and (C) Approving the Form and Manner of Notice Thereof and (II) Granting Related Relief [D.I. 1793] (the "Customer Bar Date Order"). The Customer Bar Date Order established, among other things, the deadline of September 29, 2023 to file Customer Claims² against the Debtors.
- 4. To date, approximately 94,300 customer proofs of claim have been filed against the Debtors, asserting more than \$49,459,000,000.³

No Liability Claims

5. The Debtors and their advisors are reviewing and reconciling all proofs of claim and any related supporting documentation filed against the Debtors. The Debtors have determined, based on their books and records, that the Debtors do not have any liability with respect to each proof of claim listed on Schedule 1 and Schedule 2 to Exhibit A

[&]quot;Customer Claims" means a claim (as defined in section 101(5) of the Bankruptcy Code) of any kind or nature whatsoever (whether arising in law or equity, contract or tort, under the Bankruptcy Code, or federal or state law, rule or regulation, common law or otherwise) held by any person (as defined in section 101(41) of the Bankruptcy Code) or entity (as defined in section 101(15) of the Bankruptcy Code) against any of the Debtors, in each case, arising out of or related to (a) any cash, cryptocurrency, digital assets or other assets held by such person or entity in an account on any FTX exchange as of the Petition Date or (b) any other investment or trading activities on any FTX exchange.

Excludes 480 frivolous customer claims filed in aggregate for more than \$1.187 sextillion.

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(the "No Liability Claims"). Accordingly, the Debtors submit that the No Liability Claims should be disallowed and expunged in their entirety.

Jurisdiction and Venue

6. The Court has jurisdiction to consider this Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are sections 105(a) and 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1. Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final order or judgment by the Court in connection with this Objection to the extent it is later determined that the Court, absent the consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Basis for Relief

7. Section 502(a) of the Bankruptcy Code provides, in pertinent part, as follows: "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). Once an objection to a claim is filed, the Court, after notice and hearing, shall determine the allowed amount of the claim. 11 U.S.C. § 502(b). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that it "is unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b).

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- 8. Further, Local Rule 3007-1(d) provides that a debtor may object on a Substantive basis to a "claim that does not have a basis in the debtor's books and records and does not include or attach sufficient information or documentation to constitute *prima facie* evidence of the validity and amount of the claim, as contemplated by [Bankruptcy Rule] 3001(f)" Local Rule 3007-1(d)(vi); *see also In re Exide Technologies*, 2014 WL 6081302, at *1 (Bankr. D. Del. Oct. 14, 2014) (expunging and disallowing insufficient documentation claims); *In re FBI Wind Down, Inc.*, 2015 WL 1181890, at *1 (Bankr. D. Del. Mar. 3, 2015) (same).
- 9. While a properly filed proof of claim is *prima facie* evidence of the claim's allowed amount, when an objecting party presents evidence to rebut a claim's *prima facie* validity, the claimant bears the burden of proving the claim's validity by a preponderance of evidence. *See In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992) ("Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is '*prima facie*' valid."). The burden of persuasion with respect to the claim is always on the claimant, *id.* at 174, and the failure to allege facts and to provide adequate support for a claim eliminates the claim's *prima facie* validity. *See, e.g., In re Jorczak*, 314 B.R. 474, 481-82 (Bankr. D. Conn. 2004) (discussing the evidentiary requirements and burden of proof with respect to the allowance of claims).
- 10. As set forth in the Esposito Declaration, based upon a review of the No Liability Claims, the Debtors' books and records, and the claims register, the Debtors have

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identified that the No Liability Claims lack the requisite supporting documentation to verify the existence of any claim against the Debtors. While certain No Liability Claims include documentation, the attached documentation bears no discernable relationship to, or support for, the liability asserted in the underlying claim. Other No Liability Claims attach no supporting documentation at all. In addition, it appears that certain claimants had an FTX account, those accounts had no fiat, cryptocurrency or non-fungible tokens. Moreover, certain other no liability claims were asserted against an FTX debtor but the liability rests with the non-debtor entities FTX Japan K.K. or FTX Turkey Teknoloji ve Ticaret Anonim Sirketi. Thus, the Debtors have determined that the No Liability Claims, with the current attached documentation and FTX account balances, which reflect no fiat, cryptocurrency or non-fungible tokens, are insufficient to verify the existence or amount of the underlying claims as they relate to the Debtors. As such, the No Liability Claims are not *prima facie* valid.

11. Pursuant to Bankruptcy Rule 3001(c), a claimant that files a proof of claim based on a writing must file an original or duplicate of the writing with the proof of claim or otherwise explain that the writing has been lost or destroyed. Only a proof of claim filed in accordance with Bankruptcy Rule 3001(c) constitutes *prima facie* evidence of its validity or amount. *See In re Olympus Healthcare Grp., Inc.*, 2004 WL 144240, at *3 (Bankr. D. Del. Jan. 23, 2004) (finding that the claimant failed to prove its claim by not attaching the guaranty to the proof of claim and did not produce it (or a copy of it) at the hearing on the objection to that claim).

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12. Accordingly, the Debtors submit that the No Liability Claims should be disallowed and expunged in their entirety from the claims register.

Responses to This Objection

- 13. To contest the Debtors' determinations of the No Liability Claims included in this Objection, a claimant must file and serve a written response to this Objection (a "Response") so that it is received no later than December 6, 2024 at 4:00 p.m. (ET) (the "Response Deadline"). Each Response to this Objection must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware: 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon counsel to the Debtors, (a) Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Christian P. Jensen (jensenc@sullcrom.com) and David M. Rosenthal (rosenthald@sullcrom.com) and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Matthew R. Pierce (pierce@lrclaw.com) and Kimberly A. Brown (brown@lrclaw.com), so as to be actually received by no later than the Response Deadline.
- 14. Each Response to this Objection must, at a minimum, contain the following information:
 - (a) a caption setting forth the name of the Court, the name of the Debtors, the lead case number, and the title of the Objection to which the Response is directed;
 - (b) the name of the claimant, the claim number, and a description of the basis for the amount of the claim;
 - (c) the specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;

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- (d) all documentation and other evidence, to the extent it was not included with the proof of claim previously filed, upon which the claimant will rely to support the basis for and amounts asserted in the proof of claim and in opposing this Objection; and
- (e) the name, address, telephone number, fax number or email address of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Debtors should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the No Liability Claim on behalf of the claimant.
- 15. If a claimant fails to timely file and serve a Response by the Response Deadline, the Debtors will present to the Court the Order disallowing and expunging in their entirety the No Liability Claims without further notice to the claimant or a hearing.
- 16. The Debtors may file and serve a reply to any Response in accordance with the Local Rules. The Debtors reserve the right to seek an adjournment of the hearing on any Response to this Objection, which adjournment will be noted on the notice of agenda for the hearing.

Reservation of Rights

17. Nothing in this Objection: (a) is intended or shall be deemed to constitute an assumption of any agreement pursuant to section 365 of the Bankruptcy Code or an admission as to the validity of any claim against the Debtors or their estates; (b) shall impair, prejudice, waive, or otherwise affect the rights of the Debtors or their estates to contest the validity, priority, or amount of any claim against the Debtors or their estates; (c) shall impair, prejudice, waive, or otherwise affect the rights of the Debtors or their estates with respect to any and all claims or causes of action against any third party; or (d) shall be construed as a promise to pay a

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claim or continue any applicable program post-petition, which decision shall be in the discretion of the Debtors. Any payment made pursuant to an order of the Court granting the relief requested herein is not intended to be nor should it be construed as an admission as to the validity of any claim or a waiver of the Debtors' rights to subsequently dispute such claim.

18. The Debtors retain their rights to later object on any basis to any No Liability Claim as to which the Court does not grant the relief requested herein.

Separate Contested Matters

19. To the extent a Response is filed regarding any claim listed in this

Objection and the Debtors are unable to resolve the Response, the objection by the Debtors to
such claim shall constitute a separate contested matter as contemplated by Bankruptcy Rule

9014. Any order entered by the Court regarding an objection asserted in this Objection shall be
deemed a separate order with respect to each claim subject thereto.

Compliance with Local Rule 3007-1

20. To the best of the Debtors' knowledge and belief, this Objection and the related exhibits comply with Local Rule 3007-1. To the extent this Objection does not comply in all respects with the requirements of Local Rule 3007-1, the undersigned believes such deviations are not material and respectfully requests that any such requirement be waived.

Notice

21. Notice of this Objection has been provided to: (a) the U.S. Trustee;
(b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal
Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for

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the District of Delaware; (g) counsel for the Ad Hoc Committee; (h) each claimant whose claim is subject to this Objection; and (i) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be provided.

No Prior Request

22. No prior request for the relief sought herein has been made by the Debtors to this or any other court.

Conclusion

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that the Court (a) enter the Order, substantially in the form attached hereto as Exhibit A, and (b) grant such other and further relief as is just and proper.

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Dated: October 23, 2024 Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

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-and-

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Counsel for the Debtors and Debtors-in-Possession

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

FTX TRADING LTD., et al., ¹ Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

Hearing Date: December 12, 2024 at 1:00 P.M. (ET) Objection Deadline: December 6, 2024 at 4:00 P.M. (ET)

NOTICE OF OBJECTION

TO: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for the District of Delaware; (g) counsel for the Ad Hoc Committee; (h) each claimant whose claim is subject to this Objection; and (i) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002.

On October 23, 2024, FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the "Debtors") filed the Debtors' One Hundred Twenty-Seventh (Substantive) Omnibus Objection to Certain No Liability Proofs of Claim (Customer Claims) (the "Objection").

Responses, if any, to the relief requested in the Objection must be filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 6, 2024 at 4:00 P.M. (ET).**

At the same time, you must also serve a copy of the response upon the undersigned counsel so as to be received no later than 4:00 P.M. (ET) on December 6, 2024.

A HEARING ON THE OBJECTION WILL BE HELD ON **DECEMBER 12, 2024 AT 1:00 P.M. (ET)** BEFORE THE HONORABLE JOHN T. DORSEY, CHIEF UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5^{TH} FLOOR, COURTROOM 5, WILMINGTON, DELAWARE 19801.

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

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IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 23, 2024 Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

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Counsel for the Debtors and Debtors-in-Possession

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EXHIBIT A

Proposed Order

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Ref. No
Debtors.	(Jointly Administered)
FTX TRADING LTD., et al., 1	Case No. 22-11068 (JTD)
In re:	Chapter 11

ORDER SUSTAINING DEBTORS' ONE HUNDRED TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)

Upon the one hundred twenty-seventh omnibus objection (the "Objection")² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors") for entry of an order (this "Order") sustaining the Objection and disallowing and expunging in their entirety the No Liability Claims set forth in Schedule 1 and Schedule 2 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

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being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

- 1. The Objection is SUSTAINED as set forth herein.
- 2. Each No Liability Claim set forth in <u>Schedule 1</u> and <u>Schedule 2</u> attached hereto is disallowed and expunged in its entirety.
- 3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any No Liability Claim referenced or identified in the Objection that is not listed on <u>Schedule 1</u> and <u>Schedule 2</u> attached hereto.

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- 4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover are preserved.
- 5. To the extent a response is filed regarding any No Liability Claim, each such No Liability Claim, and the Objection as it pertains to such No Liability Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each No Liability Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.
- 6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.
- 7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.
- 8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other

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applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

- 9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.
- 10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated:	
Wilmington, Delaware	The Honorable John T. Dorsey
	Chief United States Bankruntey Judge

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SCHEDULE 1

No Liability Claims

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FTX Trading Ltd. 22-11068 (JTD)

One Hundred Twenty-Seventh Omnibus Claims Objection
Schedule 1 - No Liability Claims

Claim			Asserted Claims	
Number	r Name	Debtor	Tickers	Ticker Quantity
129	Name on file	FTX Trading Ltd.		Undetermined
ason:	The Claimant did not provi	de proper documentation to support the asse	rted customer entitlement claim. Utilizing the information provided within t	he claim form and following a robust review of the
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eason: 1 1514 1500ks and 1500ks and 1705 eason: T	Name on file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file Name on file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records a	West Realm Shires Services Inc. West Realm Shires Services Inc. de proper documentation to support the asset on the incidentified any liability owing to, or custor of the incidentified any liability owing to the inci	omer entitlement of, the claimant. POC Other Crypto Assertions: TBD red customer entitlement claim. Utilizing the information provided within the omer entitlement of, the claimant. ARS AUD BRL CAD CHF EUR GBP GHS HKD JPY MXN SGD TRY USD VND XOF ZAR red customer entitlement claim. Utilizing the information provided within the omer entitlement of, the claimant.	10,000.00000000000000000000000000000000
pooks and pooks	Name on file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file Name on file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records, the Debtors have a file The Claimant did not provide records a	West Realm Shires Services Inc. West Realm Shires Services Inc. de proper documentation to support the asset on the incidentified any liability owing to, or custor of the incidentified any liability owing to the inci	power entitlement of, the claimant. POC Other Crypto Assertions: TBD red customer entitlement claim. Utilizing the information provided within the order entitlement of, the claimant. ARS AUD BRI. CAD CHF EUR GBP GHS HKD JPY MXN SGD TRY USD VND XOF ZAR red customer entitlement claim. Utilizing the information provided within the order entitlement of, the claimant. ARGO POC Other Ticker Assertions: BOBA NETWORK	10,000.00000000000000000000000000000000
eason: 1 books and 1514 150ks and 1705 1705 1705 1705 1705 1705 1706 1706 1706 1706 1706 1706 1706 1706	Name on file The Claimant did not provid d records, the Debtors hav Name on file The Claimant did not provid d records, the Debtors hav Name on file The Claimant did not provid d records, the Debtors hav Name on file The Claimant did not provid d records, the Debtors hav Name on file	de proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset entitled in the proper do	omer entitlement of, the claimant. POC Other Crypto Assertions: TBD red customer entitlement claim. Utilizing the information provided within the omer entitlement of, the claimant. ARS AUD BRL CAD CHF EUR GBP GHS HKD JPY MXN SGD TRY USD VND XOF ZAR red customer entitlement claim. Utilizing the information provided within the omer entitlement of, the claimant. ARG POC Other Ticker Assertions: BOBA NETWORK SOL POC Other Ticker Assertions: STAR ATLAS ATLAS	10,000.00000000000000000000000000000000
asson: T 514 300ks and 514 300ks and 705 asson: T 300ks and 527	Name on file The Claimant did not provide records, the Debtors have the claimant did not provide records, the Debtors have the Claimant did not provide records, the Debtors have no file The Claimant did not provide records, the Debtors have no file The Claimant did not provide records, the Debtors have no file	West Realm Shires Services Inc. West Realm Shires Services Inc. de proper documentation to support the asseve not identified any liability owing to, or custo FTX Trading Ltd. de proper documentation to support the asseve not identified any liability owing to, or custo FTX Trading Ltd. de proper documentation to support the asseve not identified any liability owing to, or custo FTX Trading Ltd. de proper documentation to support the asseve not identified any liability owing to, or custo FTX Trading Ltd.	process of the comment of the claimant. POC Other Crypto Assertions: TBD red customer entitlement claim. Utilizing the information provided within the order entitlement of, the claimant. ARS AUD BRI. CAD CHF EUR GBP GHS HKD JPY MXN SGD TRY USD VND XOF ZAR red customer entitlement claim. Utilizing the information provided within the order entitlement of, the claimant. AKRO POC Other Ticker Assertions: BOBA NETWORK SOL POC Other Ticker Assertions: STAR ATLAS ATLAS	10,000.00000000000000000000000000000000
asson: T 514 300ks and 514 300ks and 705 asson: T 300ks and 527	Name on file The Claimant did not provide records, the Debtors have the claimant did not provide records, the Debtors have the Claimant did not provide records, the Debtors have no file The Claimant did not provide records, the Debtors have no file The Claimant did not provide records, the Debtors have no file	de proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset en ot identified any liability owing to, or custor of the proper documentation to support the asset entitled in the proper do	process of the comment of the claimant. POC Other Crypto Assertions: TBD red customer entitlement claim. Utilizing the information provided within the order entitlement of, the claimant. ARS AUD BRI. CAD CHF EUR GBP GHS HKD JPY MXN SGD TRY USD VND XOF ZAR red customer entitlement claim. Utilizing the information provided within the order entitlement of, the claimant. AKRO POC Other Ticker Assertions: BOBA NETWORK SOL POC Other Ticker Assertions: STAR ATLAS ATLAS	10,000.00000000000000000000000000000000

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			Asserted Claims	
Claim Number	Name	Debtor	Tickers	Ticker Quantity
			serted customer entitlement claim. Utilizing the information provided with	
		ot identified any liability owing to, or cu		2,324.17550000000000
39222	Name on file	FTX Trading Ltd.	ATLAS BNB	1.0610000000000
			CRO	901.54010000000000
			ETH	0.11679870000000
			GALA	876.37700000000000
			MANA	7.08700000000000
			TRX	426.40640000000000
			XRP	255.15120000000000
			serted customer entitlement claim. Utilizing the information provided with	hin the claim form and following a robust review of the
353	Name on file	ot identified any liability owing to, or cu FTX Trading Ltd.	USD	4,000.00000000000000
eacon: T	he Claimant did not provide r	oroner documentation to support the as	serted customer entitlement claim. Utilizing the information provided with	hin the claim form and following a robust review of the
		ot identified any liability owing to, or cu		the claim form and following a robust review of the
8383	Name on file	West Realm Shires Services Inc.	USD	4,000.0000000000000000
eason: T	he Claimant did not provide p	proper documentation to support the as	serted customer entitlement claim. Utilizing the information provided with	hin the claim form and following a robust review of the
		ot identified any liability owing to, or cu	stomer entitlement of, the claimant.	I la data anni a ad
9569	Name on file	FTX Trading Ltd.		Undetermined
		proper documentation to support the as ot identified any liability owing to, or cu	serted customer entitlement claim. Utilizing the information provided with	hin the claim form and following a robust review of the
3094	Name on file	FTX Trading Ltd.	USD USD	7,000.00000000000000
eason: T	he Claimant did not provide r	oroner documentation to support the as	serted customer entitlement claim. Utilizing the information provided with	hin the claim form and following a robust review of the
ooks and		ot identified any liability owing to, or cu		
5224	Name on file	West Realm Shires Services Inc.		Undetermined ¹
		proper documentation to support the as ot identified any liability owing to, or cu	serted customer entitlement claim. Utilizing the information provided with stomer entitlement of, the claimant.	hin the claim form and following a robust review of the
2122	Name on file	FTX Trading Ltd.	BTC	0.00000600734789
			FTT	0.08333333333000
			LTC	0.0000000578744
			USD	222.65874900000000
eason: T	he Claimant did not provide p	proper documentation to support the as	serted customer entitlement claim. Utilizing the information provided with	hin the claim form and following a robust review of the
ooks and	records, the Debtors have n	ot identified any liability owing to, or cu	stomer entitlement of, the claimant.	
2132	Name on file	FTX Trading Ltd.	BCH	0.00521110999957
			USD USDT	95.00544809062240 15.000000000000000
			serted customer entitlement claim. Utilizing the information provided with	hin the claim form and following a robust review of the
6851	Name on file	ot identified any liability owing to, or cu FTX Trading Ltd.	stomer entitlement of, the claimant.	Undetermined
0031	Name on me	TTX Trading Eta.		3
			serted customer entitlement claim. Utilizing the information provided with	hin the claim form and following a robust review of the
4872	Name on file	ot identified any liability owing to, or cu FTX EU Ltd.	stomer entitlement of, the claimant.	Undetermined
		proper documentation to support the as ot identified any liability owing to, or cu	serted customer entitlement claim. Utilizing the information provided with stomer entitlement of, the claimant.	hin the claim form and following a robust review of the
1490	Name on file	West Realm Shires Services Inc.		Undetermined*
eason: Tl	ne Claimant did not provide p	proper documentation to support the as	serted customer entitlement claim. Utilizing the information provided with	hin the claim form and following a robust review of the
		ot identified any liability owing to, or cu	stomer entitlement of, the claimant. BNB	1,0000000000000000000000000000000000000
0063	Name on file	FTX Trading Ltd.		1.0000000000000000000000000000000000000
			BTC DOGEBULL	
			DOT	50.00000000000000
			FTT	3.000000000000000
			LINK	1.0000000000000000000000000000000000000
			SAND	1.000000000000
			SHIB	
			SOL	100.00000000000000000000000000000000000
			POC Other Ticker Assertions: TOKENS	4.000000000000000
			TONCOIN	4.000000000000
eason: Ti	ne Claimant did not provide a	oroner documentation to support the ass	serted customer entitlement claim. Utilizing the information accorded with	nin the claim form and following a solute souit was the
	records, the Debtors have no	proper documentation to support the as ot identified any liability owing to, or cu		
2639	Name on file	FTX Trading Ltd.	BTC SOL	0.37531723000000 10.553800000000000
		proper documentation to support the as ot identified any liability owing to, or cu	serted customer entitlement claim. Utilizing the information provided with stomer entitlement of, the claimant.	nin the claim form and following a robust review of the
4193	Name on file	FTX EU Ltd.	section of the dufful.	Undetermined*
eason: Th	ne Claimant did not provide p	proper documentation to support the as	serted customer entitlement claim. Utilizing the information provided with	nin the claim form and following a robust review of the
ooks and	records, the Debtors have no	ot identified any liability owing to, or cu		Undetermined
5392	Name on file	FTX Trading Ltd.		Undetermined

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Claim				Asserted Claims
Number		Name	Debtor	Tickers Ticker Quantity
				e asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of th
ooks an 5838	d records, the Name on file		not identified any liability owing to, or FTX Trading Ltd.	customer entitlement of, the claimant. Undetermined
eason: 1	The Claimant o	did not provid	e proper documentation to support the	e asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of th
ooks an 1394	d records, the		not identified any liability owing to, or FTX Trading Ltd.	customer entitlement of, the claimant. Undetermine
			-	e asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of th
ooks an	d records, the	Debtors have	not identified any liability owing to, or	customer entitlement of, the claimant.
5830	Name on file		FTX Trading Ltd.	Undetermine
ooks an	d records, the	Debtors have	not identified any liability owing to, or	e asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the customer entitlement of, the claimant.
4601	Name on file	e	FTX EU Ltd.	Undetermine
				e asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the customer entitlement of, the claimant.
5706	Name on file	e	FTX Trading Ltd.	BCH Undetermine DOGE
				FTT
				LTC
				SOL SRM
				POC Other Ticker Assertions: STABLECOIN
				USDC
				USDT
				e asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of t
oks an	d records, the Name on file		not identified any liability owing to, or FTX Trading Ltd.	customer entitlement of, the claimant. Undetermine
acon: 1	The Claimant o	did not provide	_	e asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of t
				e asserted customer entitlement claim. Othizing the information provided within the claim form and following a robust review of t ecustomer entitlement of, the claimant.
1996	Name on file	e	West Realm Shires Services In	
				(########, ########) TO GREEN LEAF SUB ACCOUNT POC Other Ticker Assertions: \$496,920-SALE OF ETH IN GREEN LEAF SUB
				ACCOUNT
		Debtors have		e asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the customer entitlement of, the claimant. The liability asserted in the claimant's other ticker assertions is reflected in filed claim USD 18.282.55000000000000
			-	
				e asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the customer entitlement of, the claimant.
1648	Name on file	e	FTX Trading Ltd.	Undetermine
				asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the customer entitlement of, the claimant.
189	Name on file		FTX Trading Ltd.	AAVE Undetermined
				ADA AVAX
				BAT
				BTC
				CEL
				DOT ETH
				LINK
				LUNC
				MANA
				MATIC
				XRP
ason: T	he Claimant d	did not provide	proper documentation to support the	asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the
		Debtors have		customer entitlement of, the claimant. Undetermine
			_	asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of th
		Debtors have	not identified any liability owing to, or	customer entitlement of, the claimant. BULL 2.1832062700000
1346	Name on file		FTX Trading Ltd.	ETHBULL 1,013.32036858000000
ason: T	he Claimant d	lid not provide	proper documentation to support the	asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of th
				customer entitlement of, the claimant. Undetermine
3928	Name on file	=	West Realm Shires Services In	undetermined

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Claim Number			Asserted Claims	
	Name	Debtor	Tickers	Ticker Quantity
			rted customer entitlement claim. Utilizing the information provided within	the claim form and following a robust review of th
	Name on file	ot identified any liability owing to, or custo FTX Trading Ltd.	FTT	1,000.000000000000000000000000000000000
			robust review of the books and records, the Debtor have determined that	the liability rests with the non-debtor entity FTX
	No liability exists on the Deb Name on file	FTX Trading Ltd.		Undetermined
		proper documentation to support the asser ot identified any liability owing to, or custo	rted customer entitlement claim. Utilizing the information provided within omer entitlement of, the claimant.	
5835 1	Name on file	FTX Trading Ltd.		Undetermined
		proper documentation to support the asser ot identified any liability owing to, or custo	rted customer entitlement claim. Utilizing the information provided within omer entitlement of, the claimant.	the claim form and following a robust review of th
1598	Name on file	FTX Trading Ltd.		Undetermined
		proper documentation to support the asser ot identified any liability owing to, or custo	rted customer entitlement claim. Utilizing the information provided within mer entitlement of the claimant	the claim form and following a robust review of th
	Name on file	FTX Trading Ltd.	The endersely of the damard.	Undetermined
		proper documentation to support the asser ot identified any liability owing to, or custo	rted customer entitlement claim. Utilizing the information provided within	the claim form and following a robust review of th
	Name on file	West Realm Shires Services Inc.	USD USD	600.00000000000000000000000000000000000
			rted customer entitlement claim. Utilizing the information provided within	the claim form and following a robust review of th
	Name on file	ot identified any liability owing to, or custo FTX Trading Ltd.	BTC-PERP	0.0000000000000000000000000000000000000
		_	ETH-PERP	0.0000000000000000000000000000000000000
			GRT	130.000000000000
			LINA MATIC-PERP	1,360.0000000000000 0.00000000000000
			SHIB	1,100,000.00000000000000000000000000000
			SLP	1,000.000000000000000000000000000000000
			USD	0.1529088618858
			USDT	0.0000000423228
	ilizing the information provided the No liability exists on the Deb		robust review of the books and records, the Debtor have determined that	the liability rests with the non-debtor entity FTX
1424 1	Name on file	FTX Trading Ltd.	JPY	1,193,300.00000000000000
	ilizing the information provid No liability exists on the Deb		robust review of the books and records, the Debtor have determined that	the liability rests with the non-debtor entity FTX
	Name on file	FTX Trading Ltd.		Undetermined
			rted customer entitlement claim. Utilizing the information provided within	the claim form and following a robust review of th
	records the Debters have no		mer entitlement of, the claimant	
	records, the Debtors have no	ot identified any liability owing to, or custo		
	Name on file	ot identified any flability owing to, or custo FTX Trading Ltd.	GMT	
				524.000000000000000
i519 i	Name on file ilizing the information provide	FTX Trading Ltd. ded within the claim form and following a r	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that t	524.000000000000000000000000000000000000
1519 i eason: Uti urkey Tekr	Name on file ilizing the information provide	FTX Trading Ltd.	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that t	524.000000000000000000000000000000000000
4519 h eason: Uti urkey Tekr 5390 h	Name on file illzing the information provious noloji ve Ticaret Anonim Sirk Name on file	FTX Trading Ltd. ded within the claim form and following a r keti. No liability exists on the Debtors' book FTX Trading Ltd.	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that t	524.000000000000000000000000000000000000
eason: Uti urkey Tekr 5390 M eason: The poks and r	Name on file illzing the information provious of the information provious Sirk Name on file e Claimant did not provide p	FTX Trading Ltd. ded within the claim form and following a r keti. No liability exists on the Debtors' book FTX Trading Ltd.	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that to sand records.	524.000000000000000000000000000000000000
eason: Uti urkey Tekr 5390 h eason: The boks and r 5643 h	Name on file illizing the information providence of the information Sirk Name on file e Claimant did not provide precords, the Debtors have no Name on file	FTX Trading Ltd. ded within the claim form and following a r keti. No liability exists on the Debtors' book FTX Trading Ltd. proper documentation to support the asser ot identified any liability owing to, or custo Quoine Pte Ltd	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that the sand records. reted customer entitlement claim. Utilizing the information provided within timer entitlement of, the claimant. USD	524.000000000000000000000000000000000000
eason: Uti urkey Tekr 5390 Meason: The books and r 5643 Meason: The books and r	Name on file ilizing the information provice of the provide process of the process of the provide process of the provide process of the process of the provide process of the pr	FTX Trading Ltd. ded within the claim form and following a r keti. No liability exists on the Debtors' book FTX Trading Ltd. proper documentation to support the asser ot identified any liability owing to, or custo Quoine Pte Ltd	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that it is and records. red customer entitlement claim. Utilizing the information provided within mer entitlement of, the claimant. USD red customer entitlement claim. Utilizing the information provided within	524.000000000000000000000000000000000000
eason: Uti urkey Tekr 6390 M eason: The boks and r eason: The boks and r	Name on file illizing the information provious provious Ticaret Anonim Sirk Name on file e Claimant did not provide precords, the Debtors have no Name on file e Claimant did not provide precords, the Debtors have no Name on file	FTX Trading Ltd. ded within the claim form and following a reti. No liability exists on the Debtors' book FTX Trading Ltd. proper documentation to support the asser ot identified any liability owing to, or custo Quoine Pte Ltd proper documentation to support the asser ot identified any liability owing to, or custo FTX Trading Ltd.	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that it is and records. reted customer entitlement claim. Utilizing the information provided within mer entitlement of, the claimant. USD reted customer entitlement claim. Utilizing the information provided within mer entitlement of, the claimant.	524.000000000000000000000000000000000000
eason: Uti irkey Tekr 6390 reason: The books and r 6643 reason: The books and r leason: The books and r	Name on file ilizing the information provious provious provide precords, the Debtors have no Name on file e Claimant did not provide precords, the Debtors have no Name on file e Claimant did not provide precords, the Debtors have no Name on file e Claimant did not provide precords, the Debtors have no Name on file e Claimant did not provide precords, the Debtors have no records, the Debtors have no records, the Debtors have no records, the Debtors have no records.	eded within the claim form and following a reti. No liability exists on the Debtors' book FTX Trading Ltd. Proper documentation to support the asser ot identified any liability owing to, or custo Quoine Pte Ltd Proper documentation to support the asser ot identified any liability owing to, or custo experimentation to support the asser ot identified any liability owing to, or custo FTX Trading Ltd.	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that it is and records. red customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant. USD red customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant.	524.000000000000000000000000000000000000
eason: Uti urkey Tekr i390 h eason: The boks and r i643 h eason: The boks and r i884 h	Name on file illizing the information provide nologi ve Ticaret Anonim Sirk Name on file e Claimant did not provide precords, the Debtors have no file e Claimant did not provide precords, the Debtors have no file e Claimant did not provide precords, the Debtors have no file e Claimant did not provide precords, the Debtors have no file	FTX Trading Ltd. ded within the claim form and following a rett. No liability exists on the Debtors' book FTX Trading Ltd. proper documentation to support the asser ot identified any liability owing to, or custo Quoine Pte Ltd proper documentation to support the asser ot identified any liability owing to, or custo FTX Trading Ltd. proper documentation to support the asser ot identified any liability owing to, or custo West Realm Shires Services Inc.	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that it is and records. reted customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant. USD reted customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant.	524.000000000000000000000000000000000000
eason: Uti urkey Tekr 5390 h eason: The books and r 5643 h eason: The books and r 1174 h	Name on file ilizing the information provious provious Ticaret Anonim Sirk Name on file e Claimant did not provide precords, the Debtors have not the Deb	ded within the claim form and following a reti. No liability exists on the Debtors' book FTX Trading Ltd. Proper documentation to support the asser ot identified any liability owing to, or custo Quoine Pte Ltd Proper documentation to support the asser ot identified any liability owing to, or custo FTX Trading Ltd. Proper documentation to support the asser ot identified any liability owing to, or custo West Realm Shires Services Inc. Proper documentation to support the asser ot identified any liability owing to, or custo West Realm Shires Services Inc.	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that it is and records. red customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant. USD red customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant. ted customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant.	524.000000000000000000000000000000000000
eason: Uti urkey Tekr 5390 P eason: The books and r 5643 P eason: The books and r 9174 P eason: The	Name on file illizing the information provide nologi ve Ticaret Anonim Sirk Name on file e Claimant did not provide precords, the Debtors have no file e Claimant did not provide precords, the Debtors have no file e Claimant did not provide precords, the Debtors have no file e Claimant did not provide precords, the Debtors have no file e Claimant did not provide precords, the Debtors have no file Name on file	eded within the claim form and following a reteit. No liability exists on the Debtors' book FTX Trading Ltd. Proper documentation to support the asser ot identified any liability owing to, or custo Quoine Pte Ltd Proper documentation to support the asser ot identified any liability owing to, or custo FTX Trading Ltd. Proper documentation to support the asser ot identified any liability owing to, or custo West Realm Shires Services Inc. Proper documentation to support the asser ot identified any liability owing to, or custo or custo identified any liability owing to, or custo or custo identified any liability owing to, or custo identified any liability owing to, or custo of tidentified any liability owing to, or custo of tidentified any liability owing to, or custo of the custo of the customer of the	GMT POC Other Ticker Assertions: GREEN SATOSHI TOKEN GST USDT robust review of the books and records, the Debtor have determined that it is and records. reted customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant. USD reted customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant. reted customer entitlement claim. Utilizing the information provided within imer entitlement of, the claimant.	524.000000000000000000000000000000000000
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Claim				Asserted Claims	
lumbe	n Name		Debtor	Tickers	Ticker Quantity
				e asserted customer entitlement claim. Utilizing the information provided	
ooks an 1827	Name on file	have not ide	ntified any liability owing to, or FTX EU Ltd.	r customer entitlement of, the claimant. BTC	0.08981265000000
102/	Name on me		FIX EO LLG.	ETH	0.11763412200000
				EUR	
				e asserted customer entitlement claim. Utilizing the information provided roustomer entitlement of, the claimant.	within the claim form and following a robust review of the
0082	Name on file	mave not luc	West Realm Shires Services In		25,000.00000000000000
	Utilizing the information K. No liability exists on t			ring a robust review of the books and records, the Debtor have determine	d that the liability rests with the non-debtor entity FTX
5314	Name on file	the Deptors	FTX Trading Ltd.		Undetermined
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				e asserted customer entitlement claim. Utilizing the information provided	within the claim form and following a robust review of the
0656	Name on file	nave not ide	West Realm Shires Services In	r customer entitlement of, the claimant.	Undetermined
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				e asserted customer entitlement claim. Utilizing the information provided	within the claim form and following a robust review of the
1603	Name on file	have not ide	ntified any liability owing to, or West Realm Shires Services Ir	r customer entitlement of, the claimant.	Undetermined
1003	Name on me		West Realiff Stilles Services II	It.	Silver and the second s
				e asserted customer entitlement claim. Utilizing the information provided	within the claim form and following a robust review of the
		have not ide		r customer entitlement of, the claimant. USD	40,087.50000000000000
14966	Name on file		Alameda Research LLC	035	40,087.3000000000000
Reason:	The Claimant did not pr	rovide proper	r documentation to support the	e asserted customer entitlement claim. Utilizing the information provided	within the claim form and following a robust review of the
		have not ide		r customer entitlement of, the claimant.	40.003.500000000000000000000000000000000
5011	Name on file		Alameda Research Holdings I	nc. USD	40,087.5000000000000000
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		have not ide		customer entitlement of, the claimant.	
7167	Name on file		FTX EU Ltd.	USD	40,000,000,000,000.000.0000000000000000
Reason:	The Claimant did not pr	rovide proper	r documentation to support the	e asserted customer entitlement claim. Utilizing the information provided	within the claim form and following a robust review of the
				customer entitlement of, the claimant.	
96132	Name on file		West Realm Shires Services In	nc. USD	500.00000000000000000000000000000000000
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				e asserted customer entitlement claim. Utilizing the information provided customer entitlement of, the claimant.	within the claim form and following a robust review of the
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FTT-PERP PPY 0.58812546 SOL-1230 0.00000000				ETH-PERP		0.000000000000
SOL-1230 0.00000000 SRM 0.0100000000 SRM 0.01000000000 SRM 0.010000000000000000000000000000000000				FTT		100.0123256600000
SQL-1230 SQL				FTT-PERP		-41.9000000000001
SOL-PERP SRM 0.000000000 SRP SRM 0.000000000 SRP 1USD 24,462,65714141 SRP 0.00000000000000000000000000000000000				JPY		0.5881254684526
SOL-PERP 0.00000000 SSON: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity an K.K. No liability exists on the Debtors' books and records. 82 Name on file FTX Trading Ltd. BCH 10.19700000 BTC 1.08841943 BTC-PERP 1.0.29700000 BTC 1.08841943 BTC-PERP 1.0.2366000 DOT-1230 0.000000000 ETH PERP 1.0.23660000 DOT-1240 0.0000000000000000000000000000000000				SOL-1230		0.000000000000
SRM USD 12,262,65714114 (SRP) 12,262,6571411				SOL-PERP		0.000000000000
USD USD T 0.010000000 TRP 0.0100000000 TRP 0.0100000000 TRP 0.0100000000 TRP 0.0100000000 TRP 0.0100000000 TRP 0.0100000000 TRP 0.0000000000 TRP 0.00000000000 TRP 0.0000000000 TRP 0.000000000000 TRP 0.00000000000 TRP 0.00000000000 TRP 0.00000000000 TRP 0.0000000000 TRP 0.00000000000 TRP 0.00000000000 TRP 0.00000000000 TRP 0.00000000000 TRP 0.00000000000 TRP 0.00000000000000000000000000000000000						0.010000000000
USDT XRP 38301: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity and K.K. No liability exists on the Debtors' books and records. 822 Name on file FTX Trading Ltd. BCH BCH-PERP -10.19700000 BTC -10.8841943: BTC-9281P -10.23600000 DOT-1230 -10.000000000 FTT -10.0000000000 FTT -10.00000000000000000000000000000000000						24.262.6571411485000
A SAP 2.00000000 A Sason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity and K.K. No liability exists on the Debtors' books and records. BCH 9ERP 10.19700000 BTC 1.08841943 BTC-9ERP 1.000000000 BTC 1.08841943 BTC-9ERP 1.0000000000 BTC 1.08841943 BTC-9ERP 1.0000000000 BTH 0.00000000000000000000000000000000000						0.0100000000000
Name on File FTX Trading Ltd. BCH BCH FTX Trading Ltd. BCH						2.0000000000000
Name on file FTX Trading Ltd. BCH-PERP FTC BTC BTC BTC BTC BTC BTC BTC BTC BTC B				ng a robust review of the books and reco	rds, the Debtor have determined that the liab	pility rests with the non-debtor entity FTX
BCH-PERP BTC BTC-0331 BTC-0331 BTC-9ERP BTCB BTC-0331 BTC-PERP BTCB BTC-0331 BTC-PERP BTCB BTC-PERP BTCB BTC-0331 BTC-PERP BTCB BTCB BTC-PERP BTCB BTCB BTCB BTC-PERP BTCB BTCB BTCB BTC-PERP BTCB BTCB BTCB BTCB BTCB BTCB BTC-PERP BTCB BTCB BTCB BTCB BTCB BTCB BTCB BTC				BCH		10.19700000000000
BTC 1.08841943: BTC-0331 0.000000000 BTC-PERP 1-1.033600000 0.000000000 ETH 0.00001230 0.000000000 ETH 0.000000000 ETH 0.0000000000 ETH 0.000000000 ETH 0.00000000000000000000000000000000000			-			-10.1970000000000
BTC-0531 BTC-PERP -1.02360000 DOT-1230 ETH -1.02360000 ETH -1.023600000000 ETH -1.023600000000 ETH -1.023600000000000000000000000000000000000						1.0884194359588
BTC-PERP -1.03360000 DOT-1230 0.000000000 ETH 0.000000000 ETH 0.000005735 ETH-PERP 0.000000000 FTT 100.01232566 FTT 100.01232566 SOL-9ERP 0.000000000 JPY 0.58812546 SOL-1230 0.000000000 SRM 0.0100000000 SRM 0.00000000000000000000000000000000000						0.000000000000
DOT-1230 0.000000000 ETH 0.000057351 ETH-PERP 0.000000000 FTT 100.0123275661 FTT.PERP 4.1900000000 JPY 0.588125461 SOL-1230 0.0000000000 SOL-PERP 0.00000000000000000000000000000000000				BTC-PERP		-1.0236000000000
ETH 0.000057351 ETH-PERP 0.00000000 FTT 100.012325661 FTT-PERP 41.90000000 JPY 0.588125461 SOL-1230 0.00000000 SOL-PERP 0.00000000 SOL-PERP 0.000000000 SOL-PERP 0.000000000 SOL-PERP 0.000000000 XRP 0.0100000000 XRP 0.0100000000 XRP 0.0100000000 XRP 0.00000000000000000000000000000000000						0.000000000000
ETH-PERP 0.000000000 FTT 100.01232566 FTT-PERP 100.01232566 FTT-PERP 4.1900000000 JPY 0.58812546 SOL-1230 0.000000000 SOL-PERP 0.000000000 USD 0.000000000 USD 124,262.657141145 USDT 0.0100000000 XRP 0.0100000000 XRP 0.0100000000 XRP 0.010000000000000000000000000000000000						0.0000573500000
FTT FERP 41.90000000 JPY 0.588125461 SOL-1230 0.000000000 SOL-PERP 0.000000000 SRM 0.010000000 SRM 0.0100000000 SRM 0.010000000000000000000000000000000000				ETH-PERP		0.000000000000
FTT-PERP				FTT		100.0123256600000
JPY 0.58812346i SOL-1230 0.000000000 SOL-PERP 0.000000000 SRM 0.0100000000 USD 24,262.65714114i USDT 0.010000000 XRP 0.010000000 XRP 0.00000000000000000000000000000000000				FTT-PERP		-41.9000000000001
SOL-1230 0.000000000 SOL-PERP 0.000000000 SOL-PERP 0.000000000 SOL PERP 0.000000000 SOL PERP 0.000000000 SOL PERP 0.000000000 SON WITH SOL PERP 0.000000000 SON WITH SOL PERP 0.00000000000000000000000000000000000				JPY		0.5881254684526
SOL-PERP SPRM 0.010000000 SPRM 0.010000000 USD 24,262.65714114 USDT 2.000000000 XRP 0.010000000 XRP 2.000000000 XRP 2.000000000 XRP 2.000000000 XRP 2.000000000000000000000000000000000000				SOL-1230		0.000000000000
SRM 0.010000000 USD 24,262.657141140 USD 1 XRP 0.010000000 XRP 2.000000000 XRP 2.000000000 XRP 2.000000000 XRP 2.000000000 XRP 2.000000000000000000000000000000000000						0.0000000000000
USD 24,262.557141141 USDT 0.010000000 XRP 0.0100000000 XRP 0.00000000000000000000000000000000000						0.0100000000000
USDT XRP 0.010000000 2.0000000000000000000000000				USD		24,262.6571411485020
ason: Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtor have determined that the liability rests with the non-debtor entity and K.K. No liability exists on the Debtors' books and records. USD 20,000.000000000 ason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review oks and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. BNB Undete DOGE ETHW				USDT		0.010000000000
an K.K. No liability exists on the Debtors' books and records. Name on file FTX Trading Ltd. USD 20,000.00000000 20,000.00000000000000				XRP		2.000000000000
Name on file FTX Trading Ltd. USD 20,000.000000000 ason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review oks and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. BNB Undete DOGE ETHW				ng a robust review of the books and recor	ds, the Debtor have determined that the liab	pility rests with the non-debtor entity FTX
oks and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. 168 Name on file FTX Trading Ltd. BNB Undete DOGE ETHW				USD		20,000.00000000000000
ooks and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. 168 Name on file FTX Trading Ltd. BNB Undete DOGE ETHW	ason: Th	e Claimant did not provide pro	oper documentation to support the	asserted customer entitlement claim. Util	izing the information provided within the cla	im form and following a robust routous of the
DOGE ETHW	oks and	records, the Debtors have not	identified any liability owing to, or o	customer entitlement of, the claimant.	name and information provided within the cla	
ETHW	168	Name on file	FTX Trading Ltd.			Undetermined
SRM						
				SRM		

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Claim		Debtor		Tieleane	Tisling Quantity
Numbe	r Name	Debtor	TRX	Tickers	Ticker Quantity
			USDC		
			USDT		
eason:	The Claimant did not provide	proper documentation to support the	e asserted customer entitlem	ent claim. Utilizing the information provided w	within the claim form and following a robust review of th
		not identified any liability owing to, or			or the claim form and following a robust review of the
6186	Name on file	West Realm Shires Services In	nc.		Undetermined
eason:	The Claimant did not provide	proper documentation to support the	e asserted customer entitleme	ent claim. Utilizing the information provided w	vithin the claim form and following a robust review of th
		not identified any liability owing to, or			
6343	Name on file	FTX Trading Ltd.	USD		41.92340927025000
	Utilizing the information prov K. No liability exists on the De			oks and records, the Debtor have determined	that the liability rests with the non-debtor entity FTX
3172	Name on file	FTX EU Ltd.	EUR		55.0000000000000
		proper documentation to support the not identified any liability owing to, or			vithin the claim form and following a robust review of th
0544	Name on file	West Realm Shires Services In	nc.		Undetermine
					within the claim form and following a robust review of th
		not identified any liability owing to, or	r customer entitlement of, the	e claimant.	
6169	Name on file	FTX Trading Ltd.			Undetermined
eason:	The Claimant did not provide	proper documentation to support the	e asserted customer entitleme	ent claim. Utilizing the information provided w	vithin the claim form and following a robust review of th
ooks a	nd records, the Debtors have	not identified any liability owing to, or		claimant.	
8799	Name on file	West Realm Shires Services In			2.0000000000000
			MATIC		619.2777000000000
			SOL		119.9246000000000
					vithin the claim form and following a robust review of th
		not identified any liability owing to, or	customer entitlement of, the	e claimant.	
1060	Name on file	FTX Trading Ltd.			Undetermined
				=	vithin the claim form and following a robust review of th
ooks a	nd records, the Debtors have	not identified any liability owing to, or	customer entitlement of, the	claimant.	
4881	Name on file	FTX Trading Ltd.			Undetermined
eason:	The Claimant did not provide	proper documentation to support the	e asserted customer entitleme	ent claim. Utilizing the information provided w	within the claim form and following a robust review of th
		not identified any liability owing to, or			
3702	Name on file	FTX Trading Ltd.			Undetermine
eason:	The Claimant did not provide	proper documentation to support the	e asserted customer entitleme	ent claim. Utilizing the information provided w	rithin the claim form and following a robust review of th

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SCHEDULE 2

No Liability Claims

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FTX Trading Ltd. 22-11068 (JTD)
One Hundred Twenty-Seventh Omnibus Claims Objection
Schedule 2 - No Liability Claims

			Asserted Claims	
Claim Number	Name	Debtor	Tickers	Ticker Quantity
96854 Name o	n file	FTX Trading Ltd.	APE	700.00000000000000000000000000000000000
			ВСН	1,000.000000000000000000000000000000000
			BNB	80.000000000000000000000000000000000000
			BTC	300.00000000000000000000000000000000000
			CEL	500.00000000000000000000000000000000000
			CRO	500.00000000000000000000000000000000000
			DOGE	
			ETH	300.00000000000000000000000000000000000
			FTT	5,000.000000000000000000000000000000000
			TRY	100.00000000000000000000000000000000000
			USD	200.00000000000000000000000000000000000
			USDC	2,500.0000000000000000
			XOF	7.00000000000000
			Other Activity Asserted: 5000 - Cash	

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

Other Activity Asserted: 30 USD - FEE VOUCHER ADJUSTMENT

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the \$30 USD asserted in the other activity section of the proof of claim form. The \$30 Vouchers were removed from the customer entitlements in the Debtors' schedule amendments filed June 27, 2023. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

15213 Name on file FTX Trading Ltd. Undetermined

Other Activity Asserted: None - None

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

15834 Name on file FTX Trading Ltd. Undetermined*

Other Activity Asserted: 3000\$ - I Play NFT And Exchange Dollars

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

Other Activity Asserted: >\$1000 - Undisclosed amount

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

94728 Name on file FTX Trading Ltd. USD 5,357.7200000000000000000 USDT 9,997.28030000000000

> Other Activity Asserted: 15355.0003 - Dear System Administrator: I kindly ask you to review my account again, and provide me with an explanation for the assigned amount. If possible, I'd appreciate a detailed breakdown of the calculations used to arrive at the current claim amount. I originally had a lot of assets on the platform (including Bitcoin (BTC), Metaplex Token (MPLX), Manchester City FC Fan Token (CITY)...etc. on the list above), plus the negative amount has not been automatically corrected by the system (risk preparation gold), and there are additional stored-value USDT assets on the account. My sub-account "#######" was liquidated by the system on November 9, 2022, but the platform system did not display the correct balance, causing my balance to be negative. According to the FTX user terms, the risk fund should automatically replenish the balance to a positive number. I opened a work order on the FTX platform, but I haven't received a reply yet, causing my balance to be incorrect. According to the FTX platform terms: [When an account is approaching automatic liquidation, it will be liquidated at the liquidation price, and the liquidity supply mechanism will take over the position. The remaining margin portion is transferred to the risk reserve. If the account is liquidated, the risk reserve will allocate funds to bring the account balance back to zero. | However, at that time, the clearing system did not operate normally, because spot and futures were almost suspended at that time, and the asset price on the website showed a significant difference from that of external coinbase/binance, which proved that the system did not operate normally. On the day "November 8, 2022", I did deposit a total of 9,997.2803 USDT through on-chain stored value, but it was not shown on the account. Currently only USDT 1.38 is shown on the account. In addition, in November 2022, I opened a work order on FTX. The content is that the clearing system cannot display my sub-account balance correctly! According to the user terms of the FTX website, the clearing system guarantees that users' rights will not be affected by delays in the clearing system, and that the risk reserve will allocate funds to restore the account balance to zero by the risk guarantee mechanism (system mechanism). However, the system did not take action at that time, my rights and interests were damaged, and the negative balance affected my subsequent operations, but I have not received a reply from FTX! Thank you so much

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

Other Activity Asserted: 800€ - I don't have anymore access to all details of my crypto portfolio and my earns, but I want to get back at least my first wire transfer amount

800.000000000000000

0.00000000000000000

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No Liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

USD

Name on file

22260 Name on file

FTX Trading Ltd.

FTX Trading Ltd.

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		Asserted Claims	
Claim Number N	lame Debtor	Tickers	Ticker Quantity
		Other Activity Asserted: 30,00USD - FEE VOUCHER ADJUSTMENT	
oof of claim form. The \$ ebtors' schedule amendn	30 USD was a voucher provided to offset trading fee ments filed June 27, 2023. Utilizing the information p	serted customer entitlement claim. No liability exists on account of the \$30 USD asserted in the ot es, however the claimant didn't trade on this account. The \$30 vouchers were removed from the cu provided within the claim form and following a robust review of the books and records, the Debtor	ustomer entitlements in the
ability owing to, or custor 4908 Name on file	mer entitlement of, the claimant. FTX Trading Ltd.	USD	0.00000000000
		Other Activity Asserted: 20\$ - Signup trading bonus	
oof of claim form. The trebtors' schedule amende	rading fee voucher was provided to offset trading fe nents filed June 27, 2023. Utilizing the information p	eserted customer entitlement claim. No liability exists on account of the \$20 USD asserted in the of es, however the claimant didn't trade on this account. The vouchers were removed from the custo provided within the claim form and following a robust review of the books and records, the Debtor.	mer entitlements in the
Name on file	ner entitlement of, the claimant. FTX Trading Ltd.		Undetermir
		Other Activity Asserted: 0 - I made an inquiry by changing my email	
		serted customer entitlement claim. No Liability exists on account of the other activity asserted. Ut records, the Debtors have not identified any liability owing to, or customer entitlement of, the cla	
Name on file	West Realm Shires Services Inc.	records, the Deptors have not identified any hability owing to, or customer entitlement of, the cla	Undetermin
		Other Activity Asserted: Total claim 5643.78 - Staked ETH, shibu inu, and maker dao	
eason: The Claimant did r	not provide proper documentation to support the asset	serted customer entitlement claim. No Liability exists on account of the other activity asserted. Ut	ilizing the information
rovided within the claim f	form and following a robust review of the books and	records, the Debtors have not identified any liability owing to, or customer entitlement of, the cla	. 6
7710 Name on file	Quoine Pte Ltd	JPY	280,510.259510000000
		Other Activity Asserted: None - None	
		a robust review of the books and records, the Debtor have determined that the liability rests with	the non-debtor entity FTX
pan K.K. No liability exist 8874 Name on file	s on the Debtors' books and records. No liability exis FTX Trading Ltd.	sts on account of the other activity asserted. BTC	1.084117830000
		Other Activity Asserted: More than 21 thousand USDT - I'm confused about the question retrade me ,so I don't know more about crypto currency's type, but I had FTX account balan USDT at 11 th November 2022 serted customer entitlement claim. No Liability exists on account of the other activity asserted. Ut records, the Debtors have not identified any liability owing to, or customer entitlement of, the cla	ce more then 21 thousand
1988 Name on file	FTX Trading Ltd.		Undetermin
		Other Activity Asserted: nao me recordo perdi com criptomoedas \$60.000,00 - Não me red dinheiro, apenas criei uma conta na FTX.COM e comprei criptomoedas , quando soube da serted customer entitlement claim. No Liability exists on account of the other activity asserted. Ut records, the Debtors have not identified any liability owing to, or customer entitlement of, the cla USD	noticia da falencia ilizing the information
Name on me	FIX Hading Etu.	Other Activity Asserted: 20 - There is FEE VOUCHER ADJUSTMENT in Balance Adjustments	
roof of claim form. The trebtors' schedule amendm	rading fee voucher was provided to offset trading fee	serted customer entitlement claim. No liability exists on account of the \$20 USD asserted in the ot es, however the claimant didn't trade on this account. The vouchers were removed from the custo rovided within the claim form and following a robust review of the books and records, the Debtors	her activity section of the mer entitlements in the
Name on file	West Realm Shires Services Inc.	USD	7,283.600000000000
		Other Activity Asserted: 7,283.60 - wire transfer to my account was never deposited IMAD	******
		serted customer entitlement claim. No Liability exists on account of the other activity asserted. Uti records, the Debtors have not identified any liability owing to, or customer entitlement of, the cla	
Name on file	FTX Trading Ltd.	USD	30.00000000000000000000000000000000000
		Other Activity Asserted: 30 - IDENTIFIED AS A CUSTOMER WITH A NET POSITIVE ACCOUNT 11, 2022 OF ONE OR MORE OF THE DEBTORS IN THE CHAPTER 11 CASES OF FTX TRADING	
oof of claim form. The \$3 btors' schedule amendm	30 USD was a voucher provided to offset trading fee	serted customer entitlement claim. No liability exists on account of the \$30 USD asserted in the ot s, however the claimant didn't trade on this account. The \$30 vouchers were removed from the cu rovided within the claim form and following a robust review of the books and records, the Debtors	istomer entitlements in the
881 Name on file	West Realm Shires Services Inc.		Undetermin
		Other Activity Asserted: \$50,000 - I had a balance of \$50,000 USD with FTX US. On Novemi withdraw 2 separate wires of \$25,000 each. The app still shows the two wires in my withd never landed at my bank.	
		serted customer entitlement claim. No Liability exists on account of the other activity asserted. Uti records, the Debtors have not identified any liability owing to, or customer entitlement of, the cla	
9945 Name on file	FTX Trading Ltd.	BCH BTC XF	0.00000001933 0.00000087998 0.00000004144
		OI .	0.00000000414

0.000000004144445

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Numbe				
	er Name	Debtor	Tickers	Ticker Quantity
			Other Activity Asserted: ? - ######## claim	
			rted customer entitlement claim. No Liability exists on account of the other	
ovide	d within the claim form and foll	owing a robust review of the books and re	ecords, the Debtors have not identified any liability owing to, or customer	
88796	Name on file	West Realm Shires Services Inc.	MATIC	309.60770000000000
			SOL	59.96230000000000
			Other Activity Asserted: 59.9623 SOL and 309.6077 MATIC / 1.4714 could not transfer to coinbase.	AVAX - I had solana and matic crypto on FTX.US
ason	The Claimant did not provide o	proper documentation to support the asset	rted customer entitlement claim. No Liability exists on account of the other	er activity asserted. Utilizing the information
			ecords, the Debtors have not identified any liability owing to, or customer	
5278	Name on file	West Realm Shires Services Inc.		Undetermined
			Other Activity Asserted: 20000 - I was a customer of these platform	s
ason	The Claimant did not provide r	proper documentation to support the asset	rted customer entitlement claim. No Liability exists on account of the other	er activity asserted. Utilizing the information
			ecords, the Debtors have not identified any liability owing to, or customer	
546	Name on file	FTX Trading Ltd.	BTC	14,657.0000000000000
5 .0			CEL	3,200.000000000000
			ETH	6,500.00000000000000
			SUSHI	665.00000000000000
			USD	
				750.0000000000000
			USDC	320.0000000000000
			USDT	54.0000000000000
			Other Activity Asserted: 14000 - I believe I lost at minimum somewhat	nere along the lines of at least \$14,000
eason	The Claimant did not provide p	proper documentation to support the asser	rted customer entitlement claim. No Liability exists on account of the other	er activity asserted. Utilizing the information
rovide	d within the claim form and foll	owing a robust review of the books and re	cords, the Debtors have not identified any liability owing to, or customer	entitlement of, the claimant.
	Name on file	FTX Trading Ltd.	SOBTC	0.21489000000000
			Only Antivity Asserted 0.214902 DTC - 59215 at the time of cuitie	- Land Control PTC (FTV - Control PTC)
			Other Activity Asserted: 0.214893 BTC = 5821\$ at the time of writin	
			But I didn't receive BTC, I received "(Sollet) BTC", which is issued and	d pegged by FTX to allow BTC to interact with the
			But I didn't receive BTC, I received "(Sollet) BTC", which is issued an Solana blockchain. When the FTX saga happened, (Sollet) BTC lost a	d pegged by FTX to allow BTC to interact with the II value and it was impossible for me to sell it
			But I didn't receive BTC, I received "(Sollet) BTC", which is issued an Solana blockchain. When the FTX saga happened, (Sollet) BTC lost a anymore. Today instead of my 0.21489 (Sollet) BTC being valued 58	of pegged by FTX to allow BTC to interact with the II value and it was impossible for me to sell it 21.02\$. It is worth 286\$ at the time of writing this.
			But I didn't receive BTC, I received "(Sollet) BTC", which is issued an Solana blockchain. When the FTX saga happened, (Sollet) BTC lost a	of pegged by FTX to allow BTC to interact with the II value and it was impossible for me to sell it 21.02\$. It is worth 286\$ at the time of writing this.
3797 eason			But I didn't receive BTC, I received "(Sollet) BTC", which is issued an Solana blockchain. When the FTX saga happened, (Sollet) BTC lost a anymore. Today instead of my 0.21489 (Sollet) BTC being valued 58 My claim is to be reimbursed for the (Sollet) BTC that I have in my 3 rted customer entitlement claim. No Liability exists on account of the other	d pegged by FTX to allow BTC to interact with the Il value and it was impossible for me to sell it 21.02\$. It is worth 286\$ at the time of writing this. rd party (phantom) wallet. er activity asserted. Utilizing the information
3797 eason: ovide	d within the claim form and foll	lowing a robust review of the books and re	But I didn't receive BTC, I received "(Sollet) BTC", which is issued an Solana blockchain. When the FTX saga happened, (Sollet) BTC lost a anymore. Today instead of my 0.21489 (Sollet) BTC being valued S8 My claim is to be reimbursed for the (Sollet) BTC that I have in my 3 crted customer entitlement claim. No Liability exists on account of the other cords, the Debtors have not identified any liability owing to, or customer	d pegged by FTX to allow BTC to interact with the Il value and it was impossible for me to sell it 21.025. It is worth 2865 at the time of writing this. rd party (phantom) wallet. er activity asserted. Utilizing the information entitlement of, the claimant.
8797 eason: rovide			But I didn't receive BTC, I received "(Sollet) BTC", which is issued an Solana blockchain. When the FTX saga happened, (Sollet) BTC lost a anymore. Today instead of my 0.21489 (Sollet) BTC being valued 58 My claim is to be reimbursed for the (Sollet) BTC that I have in my 3 rted customer entitlement claim. No Liability exists on account of the other	d pegged by FTX to allow BTC to interact with the Il value and it was impossible for me to sell it 21.025. It is worth 2865 at the time of writing this. rd party (phantom) wallet. er activity asserted. Utilizing the information entitlement of, the claimant.
8797 eason: rovide	d within the claim form and foll	lowing a robust review of the books and re	But I didn't receive BTC, I received "(Sollet) BTC", which is issued an Solana blockchain. When the FTX saga happened, (Sollet) BTC lost a anymore. Today instead of my 0.21489 (Sollet) BTC being valued S8 My claim is to be reimbursed for the (Sollet) BTC that I have in my 3 crted customer entitlement claim. No Liability exists on account of the other cords, the Debtors have not identified any liability owing to, or customer	d pegged by FTX to allow BTC to interact with the II value and it was impossible for me to sell it 21.025. It is worth 2865 at the time of writing this. rd party (phantom) wallet. er activity asserted. Utilizing the information entitlement of, the claimant. 0.2148930000000
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provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

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EXHIBIT B

Esposito Declaration

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FTX TRADING LTD., et al., 1	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)

DECLARATION OF ROB ESPOSITO IN SUPPORT OF DEBTORS' ONE HUNDRED TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN NO LIABILITY CLAIMS (CUSTOMER CLAIMS)

I, Rob Esposito, hereby declare under penalty of perjury:

- 1. I am a Senior Director at Alvarez & Marsal North America, LLC ("A&M"), a restructuring advisory services firm specializing in interim management, crisis management, turnaround consulting, operational due diligence, creditor advisory services and financial and operation restructuring.
- 2. I have more than 15 years of restructuring experience across various industries, including broadcasting, oil & gas, manufacturing, pharma, transportation, automotive, retail, telecommunications, and healthcare.
- 3. Since joining A&M, I have been involved in numerous Chapter 11 restructurings, including Alpha Natural Resources, Sandridge Energy, Westmoreland Coal, Endo

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

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International, Cumulus Media, Coach America, Cooper-Standard Automotive, Ascena Retail and Exide Technologies.

- 4. I submit this declaration (the "Declaration") in support of the Debtors' One Hundred Twenty-Seventh (Substantive) Omnibus Objection to Certain No Liability Claims (Customer Claims) (the "Objection").² I am not being compensated separately for this testimony other than through payments received by A&M as financial advisor retained by FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors").
- 5. Except as otherwise indicated herein, all of the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by the Debtors' management, the Debtors and other Debtor professionals, including the A&M team, involved in advising the Debtors in the above-captioned case (the "Chapter 11 Case"). If called upon to testify, I could and would testify to the facts set forth herein on that basis. I am authorized to submit this Declaration on behalf of the Debtors.
- 6. The No Liability Claims subject to the Objection were carefully reviewed and analyzed in good faith using due diligence by appropriate personnel of the Debtors, A&M, and the Claims Agent. Indeed, the Debtors and their advisors have spent months reviewing and analyzing proofs of claim and any supporting documentation filed against the Debtors. These

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

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efforts resulted in, among other things, identifying the No Liability Claims set forth in <u>Schedule</u>

1 and Schedule 2 to Exhibit A of the Objection.

7. Based on the Debtors' and their advisors' ongoing analysis and review, the

Debtors and their advisors have determined that the No Liability Claims are not reflected in the

Debtors' books and records. There are no details on the face of the No Liability Claims that

explain the conduct or activity giving rise to a claim against the Debtors, nor that substantiate the

amount of the claims asserted. In addition, it appears that certain claimants had an FTX account,

however the accounts had no fiat, cryptocurrency or non-fungible tokens. Moreover, certain

other no liability claims were asserted against an FTX debtor but the liability rests with the non-

debtor entities FTX Japan K.K. or FTX Turkey Teknoloji ve Ticaret Anonim Sirketi. Therefore,

I believe that the No Liability Claims should be disallowed and expunged in their entirety.

8. If the No Liability Claims are not disallowed, the affected Claimants may

receive an unwarranted recovery from the estate. Further, I believe the administration of these

claims would be more efficient and fair to all parties if the Debtors have the ability to expunge

and disallow the No Liability Claims in their entirety.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing

is true and correct to the best of my knowledge and belief.

Dated: October 23, 2024

/s/ Rob Esposito

Rob Esposito

Alvarez & Marsal North America, LLC

Senior Director

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